Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In Re:	)	
	)	
Delete, Delete, Delete	)	GN Docket No. 25-133
	)	

COMMENTS OF ZP BETTER TOGETHER, LLC

I. INTRODUCTION AND SUMMARY

ZP Better Together, LLC ("ZP" or "ZP Better Together"), is pleased to submit these comments to the Federal Communications Commission ("FCC" or "Commission") in its Delete, Delete, Delete proceeding, which seeks to identify "rules for the purpose of alleviating unnecessary regulatory burdens."[1] ZP is an FCC certified provider of video relay service ("VRS"), which provides vital communications access for people who are deaf, hard of hearing or have speech disabilities.[2] ZP has been certified by the FCC as a VRS provider for over a decade,[3] and continues to provide quality services for its users while promoting competition in the VRS marketplace.

ZP wholeheartedly supports the Commission's efforts to delete unnecessary rules that impose unwarranted burdens, thwart competition, and deter technological innovation. And there are plenty of such rules in the telecommunications relay services ("TRS") space. For example,

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[1] *In re Delete, Delete, Delete*, GN Docket No. 25-133, Public Notice, DA 25-219, at 1 (rel. Mar. 12, 2025), https://docs.fcc.gov/public/attachments/DA-25-219A1.pdf ("Public Notice").
[2] *See Grant of Conditional Certification for ZP Better Together, LLC to Provide Video Relay Service after its Acquisition by Teleperformance Group, Inc*., CG Docket Nos. 03-123, 10-51, Public Notice, DA 25-93 (rel. Jan 29, 2025), https://docs.fcc.gov/public/attachments/DA-25-93A1.pdf.
[3] *See Notice of Grant of Conditional Certification for CSDVRS, LLC to Provide Video Relay Service After Its Acquisition by Kinderhook Capital Fund IV, L.P.*, Public Notice, 29 FCC Rcd 16237 (rel. Dec. 22, 2014).

the Commission has estimated that its TRS rules impose an annual burden of 678,437 hours of paperwork on TRS providers and the public.[4] That's the equivalent of hiring 326 employees to work 40 hours a week, 52 weeks a year on paperwork—all paid for by the American public through the Interstate TRS Fund. Needless paperwork has no value to the FCC, the broader public, or the deaf and hard of hearing community; the rules requiring it should be deleted.

The Commission has specifically asked for commenters to make recommendations based on cost-benefit considerations,[5] implementation experience,[6] marketplace and technological changes and impacts,[7] and other legal or regulatory considerations that may have changed since the imposition of certain rules.[8] ZP has identified numerous regulations—including those governing at-home VRS interpreting, reducing flexibility for Communications Assistants and VRS users, imposing redundant information collections, and mandating outdated technological requirements—that impose unnecessary burdens that are out of step with their attendant benefits, and therefore warrant deletion by the Commission.

II. THE COMMISSION SHOULD ELIMINATE UNECESSARY REGULATIONS GOVERNING AT-HOME INTERPRETING.

ZP has identified two rules in the VRS environment governing at-home Communications Assistants ("CAs") that unnecessarily impede VRS services to the deaf and hard of hearing

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[4] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Info. Collection Request, OMB Control No. 3060-0463 (Mar. 19, 2025), https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202501-3060-003; *Misuse of Internet Protocol Captioned Telephone Service (IP CTS)*, Info. Collection Request, OMB Control No. 3060-1053 (Dec. 13, 2023), https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202310-3060-016; *Structure and Practices of the Video Relay Service Program,* Info. Collection Request, OMB Control No. 3060-1089 (Dec. 5, 2023), https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202310-3060-006.

[5] Public Notice at 2.

[6] *Id*. at 3.

[7] *Id*. at 3-4.

[8] *Id*. at 4.

community. Section 64.604(d)(7)(i) limits At-Home Interpreting to 80% of each VRS provider's total minutes.[9] And section 64.604(d)(7)(vi) requires the submission of monthly reports that list out the full street address of at-home CAs (among other things).[10] These rules warrant deletion given inherent cost-benefit considerations, experience gained from the implementation of the rule, and marketplace and technological changes.

First, ZP recommends that the Commission delete its regulation that limits At-Home Interpreting to 80% of total minutes.[11] Expanding opportunities for At-Home Interpreting saves money on call center expenses and does not harm service quality. And as the Commission noted when it increased the "cap" to 80%, removing restrictions on At-Home Interpreting supports efforts to recruit and retain qualified interpreters who seek the flexibility to work from home.[12] Rapid advances in connectivity and technological capabilities have mitigated any concerns about technological limitations on service quality from At-Home Interpreting. To the extent that the Commission continues to believe in the value of VRS providers maintaining some call centers "so that newly hired or inexperienced [staff] can benefit from in-person supervision or mentoring" (the reason the Commission gave in 2023 for retaining some limit),[13] in ZP's operational experience, the cap is a poor fit to accomplish this goal. The Commission should delete the rule and at most should require VRS providers to maintain one or two traditional call centers where such in-person supervision and mentoring can occur.

[9] 47 C.F.R. § 64.604(d)(7)(i).
[10] *Id*. § 64.604(d)(7)(vi).
[11] *Id*. § 64.604(d)(7)(i).
[12] *Structure and Practices of the Video Relay Services Program*, Report and Order, 38 FCC Rcd 12750, at 12756, ¶ 14 (rel. Dec. 20, 2023) ("allowing more minutes to be handled by such CAs will expand the pool of potential job candidates and help alleviate the shortage of qualified interpreters available for VRS work").
[13] *Id*. at 12757, ¶ 15.

Second, the Commission need no longer require VRS providers to report monthly on each home workstation to the TRS Fund Administrator.[14] At-Home Interpreting has become routine for providers; removing this redundant reporting requirement would save administrative costs for both providers and the Fund Administrator. Because providers have this data, already conduct random unannounced inspections of at-home workstations, and can provide this data upon request if needed, there is no need for monthly reporting.[15] What is more, eliminating the rule will protect the privacy of communications assistants who work from home, reducing the exposure of their personal information when it is not necessary for audit or compliance purposes.

III. THE COMMISSION SHOULD DELETE UNECESSARY RULES TO INCREASE FLEXIBILITY FOR COMMUNICATIONS ASSISTANTS AND VRS USERS.

ZP has also identified two unnecessary rules in the VRS environment that impose operational rigidity on VRS providers. Section 64.604(a)(1)(v) requires CAs to remain on a call for a minimum of 10 minutes for VRS and teletypewriter ("TTY") calls (with certain exceptions).[16] Section 64.604(d)(6) requires VRS users to preregister for international calling "prior to leaving the country."[17] The Commission should delete both rules.

First, ZP's experience implementing the 10-minute rule[18] has shown that it is overly restrictive and limits provider flexibility to assign and manage calls to enhance customer satisfaction. Consistent with the FCC's regulatory framework governing VRS providers, removing this rigid time requirement will provide greater flexibility to CAs and providers, as they have an inherent competitive incentive to maximize a positive user experience.[19] Further,

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[14] 47 C.F.R. § 64.604(d)(7)(vi).
[15] *Id*. § 64.604(d)(7)(iv)(D), (E).
[16] *Id*. § 64.604(a)(1)(v).
[17] *Id*. § 64.604(d)(6).
[18] *Id*. § 64.604(a)(1)(v).
[19] *See e.g.*, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 03-123, 10-51, Report and Order and

this rigid requirement is redundant in light of the Commission's separate provision requiring effective communication[20]—which shows that removal of the 10-minute requirement will not harm user experiences.

Second, ZP recommends that the Commission remove the restrictions on international calling by registered VRS users.[21] The Commission has already recognized that, at a minimum, the rule is causing issues with U.S. citizens seeking consular assistance abroad.[22] And because the rule requires preregistration "prior to leaving the country,"[23] it means that deaf and hard-of-hearing Americans cannot enjoy the same freedom as other Americans to change their plans while abroad (let alone stranding Americans unaware of this rule without any way to call home). The Commission created this rule in 2010 to address potential fraud,[24] but has since then taken a more comprehensive approach through the creation and implementation of the User Registration Database ("URD").[25] With the URD currently in use, all VRS users are verified and accounted for, making these restrictions unnecessary. In short, deletion of this rule will support the

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Order, FCC 23-116, at 10, n. 84 (rel. Dec. 20, 2023), https://docs.fcc.gov/public/attachments/FCC-23-116A1.pdf (stating that the FCC "consistently sought to encourage and preserve the availability of a competitive choice for VRS users, because it ensures a range of service offerings analogous to that afforded voice service users and because it provides a competitive incentive to improve VRS offerings").

[20] 47 C.F.R. § 64.604(a)(1)(i).

[21] *Id*. § 64.604(d)(6).

[22] *Comment Sought on Request by U.S. Department of State to Allow International VRS Calls to U.S. Embassies and Consulates*, CG Docket Nos. 03-123, 10-51, Public Notice, DA 24-1170 (rel. Nov. 21, 2024), https://docs.fcc.gov/public/attachments/DA-24-1170A1.pdf.

[23] 47 C.F.R. § 64.604(d)(6).

[24] *See Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Declaratory Ruling, Order and Notice of Proposed Rulemaking, FCC 10-88, at 13-14, ¶ 28 (rel. May 27, 2010), https://docs.fcc.gov/public/attachments/FCC-10-88A1.pdf ("the large volume of calls terminating overseas may reflect schemes to create calls for the purpose of receiving payment from the Fund.").

[25] *See* 47 C.F.R. § 64.611(a)(4).

"functional equivalence" mission of the TRS programs by providing the deaf and hard of hearing community with the same access to international calling services afforded to the broader public.

IV. THE COMMISSION SHOULD ELIMINATE RULES THAT IMPOSE UNNECESSARY PAPERWORK ON VRS PROVIDERS.

ZP has also identified several rule provisions that impose unnecessary paperwork and reporting obligations on VRS providers. As noted earlier, the paperwork burden imposed by the Commission's rules on all forms of TRS is enormous. Here, we identify several rules without any inherent value to the public, the FCC, and the deaf and hard of hearing community, all of which warrant deletion by the Commission.

Specifically, Section 64.604(c)(1)(ii) requires TRS providers and states to submit summaries of complaint logs annually to the Commission.[26] Section 64.604(d)(2) requires VRS providers to submit call center information to the Administrator twice a year.[27] Section 64.606(g)(1) requires Internet-based TRS providers to refile information contained in their certification application each year.[28] And section 64.606(a)(2) contains a bevy of unnecessary paperwork required for certification and recertification applications.[29] The Commission should delete the first three rules and streamline the fourth.

First, ZP recommends that the Commission eliminate its regulation that requires VRS providers to submit an annual complaint log to the FCC.[30] The FCC already receives direct complaints from users. Requiring providers to submit complaint logs imposes administrative costs to prepare summaries, certify the logs, and submit them to the Commission, without any corresponding benefit. Further, because the Commission already received complaints from

[26] *Id.* § 64.604(c)(1)(ii).
[27] *Id.* § 64.604(d)(2).
[28] *Id.* § 64.606(g)(1).
[29] *Id.* § 64.606(a)(2).
[30] *Id.* § 64.604(c)(1)(ii).

users, the Commission does not need provider logs on a regular basis to identify trends or issues with the program. Eliminating this unnecessary reporting will not deprive the Commission of any needed information, as separate provisions already require providers to maintain complaint logs[31] and submit them as needed for audits and compliance.

Second, ZP recommends that the Commission eliminate its regulation that requires the submission of biannual call center reports for VRS providers (and VRS providers alone).[32] There is no reason, at this stage, to single out VRS providers for additional paperwork—and the Commission has been able to protect the public and guard against waste without any such paperwork from other TRS providers. A cost-benefit analysis therefore supports removing this requirement because it generates administrative costs to generate and file the reporting without proportional benefit to the Commission, VRS providers, users, or the public.

Third, ZP recommends that the FCC eliminate the requirement for Internet-based TRS providers to refile information contained in their certification application in each year's annual report.[33] In practice, these annual reporting requirements are redundant and unnecessarily burdensome. The Commission already requires VRS and Internet Protocol Relay ("IP Relay") providers to notify the Commission of substantive changes to their service,[34] making an annual report documenting any updates to previous certifications superfluous. Moreover, VRS providers are already separately required to file compliance plans documenting their policies, procedures, and practices for complying with federal law.[35] There is no reason to require redundant filings and data gathering on an annual basis.

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[31] *Id.* § 64.604(c)(1)(i).
[32] *Id.* § 64.604(d)(2).
[33] *Id.* § 64.606(g)(1).
[34] *Id.* § 64.606(f).
[35] *Id*. 64.606(g)(3).

Fourth, ZP recommends that the Commission significantly streamline the requirements for certification and recertification applications.[36] Current rules require that certification and recertification applications include a host of unnecessary information, including "a copy of each deed or lease for each call center operated by the applicant within the United States,"[37] "a copy of each deed or lease for each call center operated by the applicant outside of the United States,"[38] "a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support their call center functions for each call center,"[39] a "complete copy of each lease or license agreement for automatic call distribution,"[40] and a "list of all sponsorship arrangements."[41]

Compiling all this documentation is time-intensive work, incurring administrative costs that are out of proportion to their attendant benefits—especially for applicants seeking recertification (and from whom the Commission can already request such information for compliance or audit purposes). Similarly, requiring a "detailed description of how the applicant will meet all non-waived mandatory minimum standards applicable to each form of TRS offered"[42] becomes an exercise in tedium for providers that have already been certified and continue to provide quality service. At the least, the Commission should eliminate these rules for Internet-based TRS providers that have been previously certified—and the Commission should

[36] *Id.* § 64.606(a)(2); *see also id*. § 64.606(c)(2) (requiring a new application for certification after five years).
[37] *Id.* § 64.606(a)(2)(ii)(A)(*1*); *see also id*. § 64.606(a)(2)(ii)(A)(*2*).
[38] *Id.* § 64.606(a)(2)(ii)(A)(*3*).
[39] *Id.* § 64.606(a)(2)(ii)(A)(*6*).
[40] *Id.* § 64.606(a)(2)(ii)(A)(*8*).
[41] *Id.* § 64.606(a)(2)(ii)(E).
[42] *Id.* § 64.606(a)(2)(ii).

consider deleting them in their entirety unless some real benefit can be found amidst these swaths of paperwork.

Collectively, these changes would reduce unnecessary administrative costs on VRS providers while freeing up provider resources to more efficiently focus on providing quality VRS service to the deaf and hard of hearing community.

V. THE COMMISSION SHOULD REVISE ITS RULES TO STREAMLINE VRS ADMINSTRATION BY LEVERAGING ADVANCES IN TECHNOLOGY.

ZP also recommends two changes that would recognize technological advances and significantly reduce unnecessary costs. First, the Commission should implement a universal unique user ID within the URD system that can be recognized across all participating VRS providers. The current requirement for users to maintain separate unique IDs with each provider is redundant and inefficient, creating unnecessary burden for everyone involved: users, providers and the URD administrator.

Second, the Commission should terminate the VRS Access Technology Reference Platform ("VATRP") and delete its implementing rule.[43] Providers have long since achieved interoperability, and work on the open-source platform is outdated and no longer necessary.[44] Indeed, a brief look at the public source code on the Commission's website shows that it has not been updated in approximately nine years. The FCC should spend no more taxpayer or provider

[43] *See id.* § 64.619(a).
[44] *See* FCC, *Accessible Communications for Everyone*, https://www.fcc.gov/ace#acedirect (last visited Apr. 10, 2025).

funds on the project nor require providers to maintain interoperability with it.

VI. CONCLUSION

With these comments, ZP has identified several rules that impose unnecessary and redundant burdens on VRS providers. Consistent with its experience implementing those rules, as well as technological and marketplace changes, ZP recommends that the Commission "delete" or modify the above-discussed rules. ZP looks forward to working with the Commission to ensure that it can alleviate unnecessary regulatory burdens and promote the quality and efficient VRS service that ZP's customers rely on.

Respectfully submitted,

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